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9 || Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Pursuant to Local Rules 6-2 and 7-12, Defendant KINDERCARE LEARNING
CENTERS, INC. (“KinderCare”) and Plaintiffs THERESA BUCKMAN-FALDUTI and TODD
FALDUTI (collectively, the “Parties”) stipulate to extend:

24 (1) The time to complete the depositions of Todd Fallduti and the following
25 fact witnesses: Amber Bushaw, Susan Berry, and Dr. Juan Vargas from
26 Wednesday, April 14, 2010 to Wednesday, July 14, 2010;
27 (2) The time to file and serve motions to compel fact discovery from Friday,

**STIPULATION & ORDER TO EXTEND EXPERT DEPOSITION,
MOTION TO COMPEL EXPERT DISCOVERY, HEARING ON
MOTION FOR SUMMARY JUDGMENT AND TRIAL DATE;
DECLARATION OF STEPHEN J. ESTEY**

1 April 23, 2010 to Wednesday, July 21, 2010;

2 (3) The time to complete retained and non-retained expert depositions from

3 Wednesday, April 14, 2010 to Wednesday, July 14, 2010;

4 (4) The time to file and serve motions to compel retained and non-retained

5 expert discovery from Friday, April 23, 2010 to Wednesday, July 21, 2010;

6 (5) The hearing date on defendant's Motion for Summary Judgment (and

7 related briefing deadlines) from Thursday, April 15, 2010 to Thursday, July

8 15, 2010; and

9 (6) The Case Management Conference from Thursday, April 15, 2010 to

10 Thursday, July 15, 2010.

11 for the reasons stated in the Declaration of Stephen J. Estey attached hereto as Exhibit "A".

12 The parties stipulate that it is not necessary to continue the November 9, 2010 Final
13 Pretrial Conference and the November 29, 2010 trial date at this time.

14 || IT IS SO STIPULATED.

DATED: March 17, 2010

SEYFARTH SHAW LLP

By: /s/ Giovanna A. Ferrari
Jay W. Connolly
Giovanna A. Ferrari
Attorneys for Defendant
KINDERCARE LEARNING CENTERS, INC.

20 | DATED: March 17, 20010

ESTEY & BOMBERGER, LLP

By: /s/ Stephen J. Estey
Stephen Estey
Michael Bomberger
Attorneys for Plaintiffs
THERESA BUCKMAN-FALDUTI AND
TODD FALDUTI

25 PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 3/25/10

Chadwick

Hon. Judge Claudia Wilken

STIPULATION & ORDER TO EXTEND EXPERT DEPOSITION,
MOTION TO COMPEL EXPERT DISCOVERY, HEARING ON
MOTION FOR SUMMARY JUDGMENT AND TRIAL DATE;
DECLARATION OF STEPHEN L. ESTEY